

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL F. MCCLAIN

No. 22 CR 115-2

Hon. John Robert Blakey

**GOVERNMENT'S UNOPPOSED MOTION TO DISMISS AS TO  
DEFENDANT MICHAEL F. McCLAIN**

The UNITED STATES OF AMERICA, by its attorney, ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, respectfully moves this Court to dismiss the counts charged in the Indictment and the Superseding Indictment in this case against defendant Michael F. McClain. In support of the motion, the government states as follow:

1. Defendant Michael F. McClain is charged in Counts One, Nineteen, Twenty, Twenty-One, Twenty-Two, and Twenty-Three of the Superseding Indictment, as well as forfeiture allegations one and two. R. 37.

2. The jury was unable to reach a decision on the counts in which defendant McClain was charged. As a result, this Court declared a mistrial on all counts against defendant McClain. R. 332.

3. Defendant McClain was separately charged in case 20 CR 812, also pending in the United States District Court for the Northern District of Illinois. In that case, defendant McClain was recently sentenced to two years' imprisonment and six months' supervised release. *See United States v. McClain, et al.*, 20 CR 812, ECF No. 479 (N.D. Ill. July 24, 2025) (Shah, J.).

4. The government hereby moves to dismiss the charges and forfeiture allegations in the Superseding Indictment and Indictment against defendant McClain in the above-captioned case (22 CR 115).<sup>1</sup>

5. Counsel for the government has spoken with counsel for the defendant, who has no objection to this motion.

Respectfully submitted.

ANDREW S. BOUTROS  
United States Attorney

By: /s/ Sarah Streicker  
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<sup>1</sup> The Court already has dismissed forfeiture allegation two. R. 411.